

Andrew I. Silfen (*pro hac vice*)
Beth M. Brownstein (*pro hac vice*)
ARENT FOX LLP
1301 Avenue of the Americas, 42nd Floor
New York, New York 10019
Telephone: (212) 484-3900
Facsimile: (212) 484-3990
Email: andrew.silfen@arentfox.com
beth.brownstein@arentfox.com

Aram Ordubegian (SBN 185142)
ARENT FOX LLP
55 Second Street, 21st Floor
San Francisco, CA 94105
Telephone: (415) 757-5500
Facsimile: (415) 757-5501
Email: aram.ordubegian@arentfox.com

*Counsel for BOKF, NA, solely in its capacity as
Indenture Trustee for the Utility Senior Notes*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**BOKF'S NOTICE OF CROSS-MOTION
FOR LEAVE TO APPEAL ORDER
REGARDING POSTPETITION INTEREST**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Date: TBD

Time: TBD

Judge: TBD

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas
2 and Electric Company, as debtors and debtors in possession (together, the “Debtors”), in the above-
3 captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title 11 of
4 the United States Code with the United States Bankruptcy Court for the Northern District of
5 California (San Francisco Division) (the “Bankruptcy Court”).

6 **PLEASE TAKE FURTHER NOTICE** that on February 20, 2020, the Ad Hoc Committee
7 of Holders of Trade Claims filed its *Notice of Appeal and Statement of Election to Have Appeal*
8 *Heard by District Court* [ECF No. 5844], its *Motion of the Ad Hoc Committee of Holders of Trade*
9 *Claims for Leave to Appeal Order Regarding Postpetition Interest* (the “Trade Committee
10 Motion”) [ECF No. 5845], and its *Memorandum in Support of Motion of the Ad Hoc Committee*
11 *of Holders of Trade Claims for Leave to Appeal Order Regarding Postpetition Interest* [ECF No.
12 5846]. The Trade Committee’s appeal has been docketed in the District Court as No. 20-cv-1493
13 (N.D. Cal.) (Gilliam, J.).

14 **PLEASE TAKE FURTHER NOTICE** that on March 4, 2020, Mizuho Bank, LTD. in its
15 capacity as Holdco Term Loan Administrative Agent (“Mizuho”), filed a cross-motion for leave
16 to appeal [ECF No. 6060] (the “Mizuho Cross-Motion”);

17 **PLEASE TAKE FURTHER NOTICE** that, pursuant to 28 U.S.C. § 158(a)(3) and
18 Federal Rule of Bankruptcy Procedure 8004, BOKF, NA (“BOKF”) in its capacity as successor
19 indenture trustee under three Indentures dated as of (i) April 22, 2005 Supplementing, Amending
20 and Restating the Indenture of Mortgage Dated March 11, 2004; (ii) November 29, 2017; and (iii)
21 August 6, 2018, each as supplemented or amended (the “Senior Notes Indentures”), pursuant to
22 which Pacific Gas and Electric Company issued the senior notes (the “Senior Notes”), in the
23 principal amount of \$17.525 billion, has filed a *Cross-Motion for Leave to Appeal Order*
24 *Regarding Postpetition Interest* (the “BOKF Cross-Motion”). The BOKF Cross-Motion was filed
25 concurrently with BOKF’s *Notice of Appeal and Statement of Election to Have Appeal Heard by*
26 *District Court*.

27 **PLEASE TAKE FURTHER NOTICE** that the BOKF Cross-Motion may be heard by the
28 United States District Court of the Northern District of California (the “District Court”) at a date and

1 time to be set by the District Court. Pursuant to Federal Rule of Bankruptcy Procedure 8004(c)(3),
2 however, any relief requested in the BOKF Cross-Motion may be granted without a hearing.

3 **PLEASE TAKE FURTHER NOTICE** that copies of the BOKF Cross-Motion and
4 related papers can be viewed and/or obtained: (i) by accessing the Bankruptcy Court's website at
5 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
6 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime
7 Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
8 U.S.-based parties; or +1 (929) 333-8977 for international parties or by email at:
9 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
10 Bankruptcy Court's website.

11
12 DATED: March 5, 2020

ARENT FOX LLP

/s/ Aram Ordubegian

ARAM ORDUBEGIAN

ANDREW I. SILFEN

BETH M. BROWNSTEIN

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